

IN THE DISTRICT COURT OF THE VIRGIN ISLANDS

DIVISION OF ST. THOMAS AND ST. JOHN

PETER J. LYNCH,

Plaintiff,

v.

KATHRYN ANNE DONNELLY, in her Official Capacity as Virgin Islands Special Designated Disciplinary Counsel, and in her Individual Capacity, and TANISHA BAILEY-ROKA, in her Official Capacity as Virgin Islands Chief Disciplinary Counsel, and in her Individual Capacity,

Defendants.

Civil No. 3:24-cv-00043

**COMPLAINT FOR
INJUNCTIVE RELIEF
AND DAMAGES**

**KATHRYN ANNE DONNELLY’S AND TANISHA BAILEY-ROKA’S JOINT MOTION
TO DISMISS FIRST AMENDED VERIFIED COMPLAINT**

COME NOW, Kathryn Anne Donnelly, Esq., Special Designated Disciplinary Counsel and Tanisha Bailey-Roka, Esq., Chief Disciplinary Counsel for the Judiciary of the United States Virgin Islands, by and through the undersigned counsel, and hereby jointly move this Honorable

Peter J. Lynch v. Kathryn Anne Donnelly, et al.

Civil No. 3:24-cv-00043

Joint Motion to Dismiss First Amended Verified Complaint

Court to dismiss the foregoing action pursuant to FRCP, 12(b)(1), (2), (4), (5), (6), 12(e) and 12(f), and file their Memorandum of Law herewith.

DATED: October 8, 2024

RESPECTFULLY SUBMITTED,

By: /s/ Paul L. Gimenez

Paul L. Gimenez, Esq., Bar # 225

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Attorney for Defendants

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 8th day of October 2024, I caused a true and exact copy of the foregoing to be served through the Court's electronic filing system, via email upon the registered parties.

/s/ Paul L. Gimenez, Esq.